



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

NOTES OF CASES.

Proof of Value.—Morrow Transfer Co. *v.* Robinson. (No. 2,788.) Court of Appeals of Georgia. Nov. 11, 1910. Syllabus by the Court. Value, whether actual or as regulated by the market, is largely a matter of individual estimate or opinion, and liberality should be allowed in the introduction of testimony to prove value. There are many elements and tests of value. Proof of cost, condition of the property when lost, value of similar property, prices at which similar articles are sold, uses to which the property is adapted, opinions of experienced dealers in such property, and opinions of experts, all have more or less probative value; and, in short, any testimony, direct or circumstantial, which tends to throw light on the subject, and which would enable the jury to arrive at a fair conclusion, is admissible as evidence in proof of value. Peterson *v.* State, 6 Ga. App. 491, 65 S. E. 311; Atlanta Baggage & Cab Co. *v.* Mizo, 4 Ga. App. 407, 61 S. E. 844; Atlantic Coast Line R. Co. *v.* Harris, 1 Ga. App. 667, 57 S. E. 1030; 16 Cyc. 1133, 1139, 1140, 1141.

Martin *v.* Martin, 68 S. E. 1095. Supreme Court of Georgia. Sept. 24, 1910, Syllabus by the Court. On the trial of an issue involving the value in bulk of a stock of merchandise and books of account and choses in action, the opinions of witnesses as to the value of the property are not conclusive upon the jury. Bonds *v.* Brown, 133 Ga. 451, 66 S. E. 156; Jennings *v.* Stripling, 127 Ga. 778 (3) 56 S. E. 1026, and citations; Minchew *v.* Manhunta Lumber Co., 5 Ga. App. 154, 62 S. E. 716.

What Is an Original Promise under Statute of Frauds.—Mize *v.* Mashburn. (No. 2,774.) Court of Appeals of Georgia, Nov. 11, 1910. Syllabus by the Court. Young owed Mashburn an account for \$13.20, and Mize agreed with both Mashburn and Young that he (Mize) would pay this debt to Mashburn provided Young would work for Mize until he had earned a sufficient sum to pay the debt. In pursuance of this agreement Young did work for Mize until Mize owed him enough to pay his debt to Mashburn. Held, that the promise of Mize to pay Young's debt was not within the statute of frauds, but by agreement Mize became the debtor by substitution, and Young had fully performed. Howell *v.* Field, 70 Ga. 592 (1); Bohannon *v.* Jones, 30 Ga. 488; Anderson *v.* Tucker & Whitehead, 55 Ga. 278.

Proof of Other Crimes.—Lee *v.* State. (No. 2,858.) Court of Appeals of Georgia. No. 11, 1910. Syllabus by the Court. While the general rule is that proof of other crimes committed by the defendant is not admissible in a criminal prosecution, still the general rule has many general exceptions. Proof of other crimes is never admissible